

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

SHELLY MARIE MCCARTHY,	:	CHAPTER 13
a/k/a SHELLY M. MCCARTHY,	:	
a/k/a SHELLY MCCARTHY,	:	CASE NO. 22-bk-1363
Debtor.	:	
	:	
SHELLY MARIE MCCARTHY,	:	
Movant,	:	Motion to
vs.	:	Extend Automatic Stay
RUSHMORE LOAN MANAGEMENT SERVICES,	:	
MONROE COUNTY TAX CLAIM BUREAU,	:	
STROUD TOWNSHIP,	:	
and ALL PARTIES LISTED ON THE MAILING	:	
MATRIX ON FILE WITH THE CLERK OF COURT,	:	
Respondents,	:	

AFFIDAVIT OF DEBTOR IN SUPPORT OF MOTION TO EXTEND AUTOMATIC STAY

I, **SHELLY MARIE MCCARTHY**, Debtor in the above-captioned Chapter 13 Bankruptcy Case, hereby swear and affirm, under penalty of perjury, that the following is true correct and accurate to the best of my knowledge, information and belief:

1. I filed a Chapter 13 bankruptcy case on August 29, 2019, docketed at 5:19-bk-03672 (“the Prior Case”).
2. The Prior Case was filed for the purpose of saving my home from foreclosure.
3. The Prior Case was dismissed on April 6, 2022 for failure to make Plan payments following a COVID-related reduction of income.
4. I am receiving \$1,200.00 monthly income renting rooms in my home. I did not have this income in the Prior Case.

5. I am now receiving \$1,125.00 monthly in Social Security payments. I did not have this income in the Prior Case.

6. My monthly income has gone up approx. \$1500 from the previous case to this case.

7. I believe in good faith that I can make all post-petition monthly mortgage payments as well as monthly payments required under a Chapter 13 Plan because I am renting rooms in my home for additional income.

8. I am not simply attempting to postpone an eventual foreclosure on my home, and in good faith believe that I can afford both my monthly mortgage payments and the monthly payments required under a Chapter 13 plan.

Dated: July 27, 2022

/s/ Shelly Marie McCarthy

SHELLY MARIE MCCARTHY, Debtor